

Federal Defenders
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June 1, 2021

ECF and Electronic Mail
The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Brendan Hunt, 21-cr-86

Your Honor:

We write regarding the scheduling for post-conviction motions and sentencing in the above-captioned case. The defense needs more time to prepare for sentencing, get the completed psychological evaluation from NY Forensics, and to prepare a reply to the Government's opposition to the Rule 29 Motion.

The defense has proposed the following dates for the Court and Government's consideration, although we understand that the July dates may conflict with other obligations of Government counsel. These dates do work for the Probation Department.

Rule 29 Reply: June 7, 2021
PSR Disclosure: June 18, 2021
PSR Objections: June 28, 2021
Sentencing Letters: July 2, 2021
Responsive Sentencing Letters: July 16, 2021
Oral Argument for Rule 29: The week of July 12, 2021
Sentencing Date: The week of July 19, 2021

We therefore respectfully request that the Court schedule the matter for a remote conference so that we may discuss a new schedule that will be acceptable to everyone. We could use the June 4, 2021, 11:00 a.m. time now set aside for Oral Argument for that purpose, and would be amenable to appearing either remotely or in person, as the Court sees fit.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Jan A. Rostal
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Attorneys for Brendan Hunt

Cc: Counsel of Record